| 1  | JOEL E. TASCA, ESQ.   |  |  |
|----|---|--|--|
| 2  | Nevada Bar No. 014124  GREENBERG TRAURIG, LLP   |  |  |
| 3  | 10845 Griffith Peak Drive, Ste. 600<br>Las Vegas, NV 89135  |  |  |
| 4  | Tel: (702) 792-3773<br>Fax: (702) 792-9002  |  |  |
| 5  | Email: joel.tasca@gtlaw.com   |  |  |
| 6  | Attorney for LendingClub Bank, National Association   |  |  |
| 7  | UNITED STATES DISTRICT COURT  |  |  |
| 8  | DISTRICT OF NEVADA  |  |  |
| 9  | Gwendolyn Washington  | Case No. 2:24-cv-01591-JCM-EJY                                     |  |
| 10 | Plaintiff,  |  |  |
| 11 |   | STIPULATION AND <del>[PROPOSED]</del> ORDER TO EXTEND THE TIME FOR |  |
| 12 | V.  | DEFENDANT LENDINGCLUB BANK, NATIONAL ASSOCIATION TO                |  |
| 13 | Trans Union LLC; Experian Information Solutions, Inc.; Innovis Data Solutions,                      | RESPOND TO THE COMPLAINT   |  |
| 14 | Inc.;Clarity Services, Inc.;  | [FIRST REQUEST]  |  |
| 15 | Backgroundchecks.com LLC; LendingClub Bank, National Association and Equiant                        |  |  |
| 16 | Financial Services Inc,   |  |  |
| 17 | Defendants.   |  |  |
| 18 |   |  |  |
| 19 | IT IS HEREBY STIPULATED AND AGREED between the parties, by and through the                          |  |  |
| 20 | undersigned counsel, to extend the current deadline for LendingClub Bank, National Association      |  |  |
|    | ("LendingClub") to respond to Plaintiff's complaint until October 15, 2024, to allow LendingClub to |  |  |
| 21 | further investigate plaintiff's allegations, and for the parties to explore potential resolution.   |  |  |
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| 1  | This is the first request for an extension of time for LendingClub to respond to Plaintiff'                                 |  |
|----|---|--|
| 2  | complaint. This request is being sought in good faith and not for purposes of delay.  |  |
| 3  | DATED this 24th day of September, 2024.   | DATED this 24th day of September, 2024.                    |
| 4  | GREENBERG TRAURIG, LLP  | FREEDOM LAW FIRM   |
| 5  |   |  |
| 6  | /s/ Joel E. Tasca   | /s/ George Haines  |
| 7  | JOEL E. TASCA, ESQ.<br>Nevada Bar No. 014124  | GEORGE HAINES, ESQ. Nevada Bar No. 9411                    |
| 8  | 10845 Griffith Peak Drive, Ste. 600<br>Las Vegas, Nevada 89135  | GERARDO AVALOS, ESQ.<br>Nevada Bar No. 15171               |
| 9  | Attorney for LendingClub Bank, National Association   | 8985 S. Eastern Ave., Suite 100<br>Las Vegas, Nevada 89123 |
| 10 |   | Attorneys for Plaintiff Gwendolyn Washington               |
| 11 |   |  |
| 12 |   |  |
| 13 | IT IS SO ORDERED:  Laura L. Zouchah  HONORABLE ELAYNA J. YOUCHAH  UNITED STATES MAGISTRATE JUDGE  DATED: September 24, 2024 |  |
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